

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: September 20, 2004

Site Contact(s): Dyan Foss
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Regulatory Contact: Edd Kray
Phone: 303-994-3441

Agency: CDPHE

Purpose of Contact: Disposition of the Portion of Building 707 under transformers

Discussion

In 1991, one of the six transformers located on the rooftop of Building 707 was identified as leaking polychlorinated biphenyls (PCB)-containing dielectric oil. Further investigation revealed that rainwater had carried PCBs via a downspout from the contaminated rooftop to the soil below. An extensive PCB cleanup was initiated in 1991 and 1992 that involved removal of the built up roofing and scabbling the concrete. The contaminated soil was remediated in 1995.

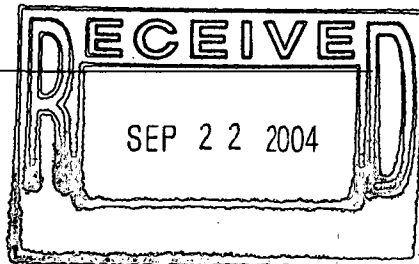
The Building 707 Reconnaissance Level Characterization Report indicated that the PCB contamination on the roof had been remediated under the Toxic Substances Control Act (TSCA) regulations; however, the method used for verifying the contamination had been removed (swipe tests) is specifically excluded in the TSCA regulations for porous surfaces like concrete. The costs for TSCA compliant sampling is greater than the cost of disposing of this portion of Building 707 as PCB waste.

This situation was discussed with the CDPHE representative, and he agreed that this portion of the facility should be demolished and dispositioned as PCB waste. This type of activity is addressed in the Building 707 Decommissioning Operations Plan (DOP) as contaminated component removal. The analysis required in that section of the DOP will be completed for all contaminated component removal associated with the Building 707 Project as one analysis.

Since the affected area is on the roof, all building rubble that is created during the removal of this area will be dispositioned as PCB waste. The removal of this area will be addressed in the Building 707 demolition work package, and the area will be marked as necessary to make is readily identifiable to the equipment operators.

Contact Record Prepared By: Dyan Foss

Contact Record 4/10/00
Rev. 5/24/04



ADMIN RECORD

B707-A-000112

1/2

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2/2